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13 DIRECT TESTIMONY
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17 KIM HARBER
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19 CITIZENS TELECOMMUNICATIONS COMPANY
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21 OF ILLINOIS
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28 DOCKET NO. 01-0539
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30 83 ILLINOIS ADMINISTRATIVE CODE PART 731
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32 WHOLESALE SERVICE QUALITY FOR
33 TELECOMMUNICATIONS CARRIERS
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44 June 11, 2002
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49 **Q. Please state your name and business address.**

50 A. My name is Kim Harber. My business address is 225 North Broad,
51 Carlinville, Illinois 62626.

52
53 **Q. Please describe your educational and occupational background.**

54 A. I attended Illinois Central College in East Peoria, IL, majoring in
55 Electronic Engineering Technology and Design and furthered my
56 education as a Communications major at Illinois State University in
57 Normal, IL. I began my telephone career in 1978 as a Service Technician
58 with General Telephone Company of IL in Chillicothe. In 1979, I was
59 promoted to the GTE – IL Engineering department, located in
60 Bloomington, IL and held various engineering positions, with increasing
61 responsibilities, in the Special Service, Transmission and Outside Plant
62 engineering and design. Through 1986, these positions included
63 Technical Assistant, Engineer and Engineering Associate and I had
64 increasing responsibilities for exchange and IOF planning, optical design
65 and engineering, special service circuit design and engineering, digital pair
66 gain/IOF engineering and design and associated remote land and building
67 engineering. In 1986, I was promoted to Administrator – Facility Support
68 at the GTE North headquarters in Westfield, IN. I was responsible for the
69 technical standards implemented by Customer Operations Department
70 throughout the 10-state operation. In 1987, I was promoted to GTE
71 District Manager, responsible for Operations, Supply and Construction

72 departments in the Olney, IL district. In 1995, I was promoted to GTE
73 Area Manager – Customer Operations, with similar responsibilities, over
74 an expanded territory headquartered in Jacksonville, IL. In 1996, I was
75 promoted to GTE Regional Manager – Customer Operations responsible
76 for all customer operation functions in the GTE Marion District office,
77 serving the geographic southern third, of GTE/Verizon’s IL exchanges.

78
79 **Q. What is your occupation and responsibilities within Citizens?**

80 A. My current position within Citizens Communications is as State Vice
81 President and General Manager for CTC-Illinois. In December, 2000 I
82 accepted this position and headquartered our offices in Carlinville, IL.
83 Citizens acquired 110 exchanges, serving approximately 110,000 access
84 lines formerly served by GTE/Verizon. My current responsibilities are to
85 oversee the entire Engineering & Construction, Sales & Marketing and
86 Customer Operation functions for the State of Illinois territory. This
87 includes all external and internal stakeholders, including customers,
88 employees, communities and regulatory agencies.

89
90 **Q. Have you previously testified in any proceeding before the Illinois**
91 **Commerce Commission?**

92 A. No.

93
94 **Q. What is the purpose of your testimony?**

95 A. The purpose of my testimony is to describe Citizens
96 Telecommunications Company of Illinois' ("CTC-Illinois")
97 recommendations for wholesale service quality rules in this docket and to
98 identify concerns CTC-Illinois has with the rules proposed by Illinois
99 Commerce Commission Staff on May 8, 2002. My testimony is filed in
100 conjunction with the testimony of Kenneth Mason. Exhibit 1.0
101 Attachment 1.1 to my testimony contains CTC-Illinois' proposed Part 731
102 rule.

103
104 **Q. Please describe how your testimony is organized?**

105 A. Section I of my testimony contains an introductory overview of CTC-
106 Illinois, the level of wholesale activity CTC-Illinois has experienced in
107 Illinois and my understanding of the purpose for the legislation passed by
108 the Illinois General Assembly in 2001 with respect to the Commission
109 establishing wholesale service quality rules. As explained below, it was
110 my understanding that the General Assembly was most concerned about
111 wholesale service quality issues for the largest ILEC in Illinois based on
112 complaints and concerns that had been raised by Competitive Local
113 Exchange Carriers ("CLEC"). Therefore, I believe the Staff's emphasis
114 on establishing extensive, substantive wholesale service quality measures
115 for Level 2 Carriers in this proceeding is misplaced. Section II of my
116 testimony contains CTC-Illinois' primary recommendation that Level 2
117 Carriers be given the opportunity to propose and file their own company-

specific Wholesale Service Quality Plan that the Commission reviews and approves for that specific company. Level 2 companies that elect to file a Wholesale Service Quality Plan would not be subject to the standards and measures included in 731.600 through 731.635. Level 2 companies that did not file a Wholesale Service Quality Plan would be required to comply with the standards and measures contained in Part 731. Section III of my testimony addresses CTC-Illinois' concerns that the rules proposed by Staff for Level 2 Carriers contain provisioning requirements for conditioning Unbundled Local Loops and providing Digitally Capable or xDSL Capable Loops that will be used to provide advanced services including line sharing and line splitting.

I. INTRODUCTION

Q. Please provide some basic background information regarding CTC-Illinois:

A. CTC-Illinois is an ILEC serving approximately 110,000 access lines in 109 exchanges in Illinois and one exchange in Wisconsin. These exchanges were purchased by CTC-Illinois from GTE North Incorporated and GTE South Incorporated in November 2000 and approved by the Illinois commerce Commission in Docket 00-0187.

Q. Describe CTC-Illinois' serving area.

140 A. CTC-Illinois serves small rural communities. The average number of
141 lines in each CTC-Illinois exchange is approximately 1000 access lines.
142 The largest exchanges served are Monmouth (approximately 6000 access
143 lines), Jerseyville (approximately 6000 access lines) and Carlinville
144 (approximately 5000 access lines).

145
146 **Q. Please describe the volume of wholesale interconnection services**
147 **CTC-Illinois is currently providing in Illinois.**

148 A. CTC-Illinois has not experienced much wholesale interconnection activity
149 in its Illinois exchanges. Since acquiring the 110 exchanges in November
150 2000, CTC-Illinois has had no requests for new collocation in its Illinois
151 central offices. CTC-Illinois is currently providing 261 Unbundled Local
152 Loops to one CLEC in one exchange and a total of 360 Resold Local
153 Service to CLECs in Illinois.

154
155 **Q. Please describe the other competitive activity that exists in CTC-**
156 **Illinois exchanges.**

157 A. In addition to the purchase of Unbundled Local Loops and Resold Local
158 Lines, certain CLECs have constructed their own facilities to provide
159 telecommunications services in CTC-Illinois' exchanges. To my
160 knowledge, there are currently three active facility-based CLECs that have
161 overbuilt CTC-Illinois infrastructure in its exchanges:
162 Rio, Illinois: Oneida Network Services, a CLEC affiliated with Oneida

Telephone Company, has over built CTC-Illinois' facilities in the Rio, Illinois exchange. It is my understanding that Oneida Network Services is a member of the Illinois Rural Competitive Alliance (IRCA). CTC-Illinois' Rio exchange had approximately 234 installed access lines. Currently, however, CTC-Illinois only serves 19 end-user access lines in Rio. In other words, only approximately 10% of the customer base in Rio is receiving telephone service from CTC-Illinois using CTC-Illinois' facilities. CTC-Illinois has lost over 90% of the customers in Rio to competitors that have installed their own facilities in the community to provide telephone service.

Alpha, Illinois: Diverse Communications Inc., a CLEC that is affiliated with Wood Hull Telephone Company, has over built CTC-Illinois facilities in the Alpha, Illinois exchange. It is my understanding that Diverse is a member of the Illinois Rural Competitive Alliance (IRCA). Alpha is an exchange that had approximately 663 installed access lines. Currently, CTC-Illinois only serves 193 end-user access lines in Alpha.

Andover, Illinois: Another CLEC has over built CTC-Illinois' facilities in the Andover exchange. Andover is an exchange that has approximately 740 installed lines. Currently, CTC-Illinois only serves 217 end-user access lines in Andover.

Q. Please describe your understanding of the purpose for the Part 731 wholesale service quality rules.

186 A. As the General Manager for CTC-Illinois' operations in 2001, I
187 monitored the legislative activity associated with H.B. 2900 in the
188 Spring and Summer of 2001. In June 2001, the Illinois Legislature
189 passed H.B. 2900 and specifically Section 13-712, which among
190 other things, directed the Illinois Commerce Commission to
191 establish various service quality rules. Section 13-712(a) which is
192 entitled "Basic local exchange service quality; customer credits"
193 provides:

194 *It is the intent of the General Assembly that every*
195 *telecommunications carrier meet minimum service quality*
196 *standards in providing basic local exchange service on a*
197 *non-discriminatory basis to all classes of customer.*
198

199 "Basic local exchange services" is defined in 220 ILCS 5/13-
200 712(b) and explicitly excludes "services that employ advanced
201 telecommunications capability" and "vertical services." Although I
202 am not a lawyer, I believe the reference to all classes of customers
203 in this statutory provision encompasses both "retail" and
204 "wholesale" customers. In Section 13- 712(g), the Illinois
205 legislature explicitly directed the ICC to develop wholesale service
206 quality rules. That section provides:

207 *The Commission shall establish and implement carrier to*
208 *carrier wholesale service quality rules and establish*
209 *remedies to ensure enforcement of the rules.*
210

211 My belief is that the Illinois legislators included Section 13-712(g)
212 in H.B. 2900 in response to concerns that various CLECs
213 expressed regarding the wholesale service they were receiving

from Ameritech. I am not aware of any concerns that were raised by legislators regarding the wholesale service quality performance of CTC-Illinois. Based my monitoring of the General Assembly activity and the language in this section, it is my understanding the ICC is to establish and implement wholesale service quality rules for services used to provide “basic local exchange service” and that the primary purpose of the rules was to respond to perceived deficiencies in the wholesale service performance CLECs were receiving.

II CONCERNS WITH LEVEL 2 CARRIER REQUIREMENTS

Q. Please summarize your concerns with the proposed Part 731 rule filed by ICC staff on May 8, 2002.

A. CTC-Illinois’s biggest concern is that the Staff has proposed extensive wholesale service requirements for Level 2 Carriers. CTC-Illinois supports the concept of different levels or tiers for carriers in Illinois, however, CTC-Illinois does not agree with the scope of services and standards and measures proposed by Staff for Level 2 carriers. CTC-Illinois recommends that Level 2 Carriers be given the opportunity to propose their own company-specific Wholesale Service Quality Plan and have the Commission investigate and approve that specific plan. If a Level 2 carrier submits a plan to the Commission which the Commission

approves, that carrier would not be subject to the remaining requirements
in Subpart F of the Staff's proposed rules related to Level 2 Carriers.

**Q. Does CTC-Illinois Support the Staff's "Classification of Carriers" in
Part 731.115 or levels to differentiate wholesale service quality
obligations?**

A. CTC-Illinois believes that the proposed Part 731 rules should be based on
multiple "levels" or "tiers" depending upon the LEC's number of access
lines in Illinois and the volume of wholesale interconnection activity. The
first level rules should be applicable to the two largest ILEC carriers that
service over 90% of all access lines in Illinois and that have already begun
or completed collaborative service-related performance plans with the
Commission as a result of merger-related or other requirements.
The second level or tier of rules, that are less extensive and onerous than
the rules for the Level 1 carriers, should apply to LECs with obligations
under Section 251(c)(4) of the Telecommunications Act and have less than
400,000 access lines in service in Illinois. It is my understanding that
there are potentially only three carriers that would fall within the scope of
Level 2: CTC-Illinois, Illinois Consolidated Telephone Company and
Gallatin River. These three companies serve approximately a total of
300,000 access lines in Illinois, which comprises less than five percent
(5%) of the total access lines in Illinois. The third "exempt" level would
apply to LECs that are covered by the Rural Exemption pursuant to 251(c)

of the Federal Telecommunications Act. It is my understanding that over forty (40) independent local exchange carriers operating in Illinois would potentially fall within the scope of Level 3.

Q. Why should a multi-tier structure for the wholesale service quality rules apply?

A. A multi-tier structure is logical because the vast majority of competitive and wholesale activity is occurring in the service areas of the two largest ILECs in Illinois. Level 3 carriers potentially are exempt from any requirement to provide wholesale interconnection services and therefore it is not necessary to establish rules for Level 3 carriers. The Part 731 rules should not be extensive and onerous for Level 2 Carriers given the limited wholesale interconnection activity in the Level 2 Carrier territories and given the fact that there are only a few Level 2 Carriers serving less than 5% of the access lines in Illinois. CTC-Illinois is the third largest ILEC in the state and has experienced very little wholesale activity in its Illinois exchanges since it acquired the exchanges from GTE in 2000. As noted above, CTC-Illinois has installed no new collocations and has a very minimal number of unbundled loops (approximately 261 loops in total – most of which were carried over from GTE when CTC-Illinois acquired the exchanges) and only 360 resold lines. CLEC order activity in terms of new loop orders or resold lines in any month is minimal. It is inappropriate to attempt to develop an extensive list of wholesale service

284 quality standards and requirements for carriers like CTC-Illinois that are
285 providing a very a low volume of wholesale services. Under the extensive
286 rules proposed by Staff, however, CTC-Illinois may potentially end up
287 spending more time tracking and reporting to comply with the Part 731
288 rule requirements than it actually will provisioning or repairing the
289 wholesale service it provides.

290
291 **Q. Does CTC-Illinois support the same set of wholesale requirements**
292 **being applied to all Level 2 carriers?**

293 A. No. Given the limited and varying levels of competitive activity in Level
294 2 Carrier exchanges and the fact that each Level 2 carrier is likely to
295 develop its own company-specific processes and systems to provision
296 wholesale services, it is appropriate for each Level 2 LEC to be allowed to
297 file a proposed service quality plan with the Commission in a stand alone
298 document describing its company-specific wholesale service
299 commitments. Interested parties should be afforded an opportunity to file
300 comments on the LEC proposal and if necessary proceed to a formal
301 proceeding to resolve any wholesale service quality concerns. The Level
302 2 LEC would not be subject to the substantive requirements contained in
303 the Part 731 rule, but would instead be subject to its own company-
304 specific wholesale service quality plan much like the existing Level 1
305 carriers Ameritech and Verizon.

CTC-Illinois proposes the following provisions be included in Section 731.600A (**Attachment 1.1 lines 857-954**) of the proposed rule to allow a Level 2 Carrier to file its own plan in lieu of complying with the requirements contained in Staff's proposed Subpart F:

Filing of Wholesale Service Quality Plans by Level 2 Carriers

- a) *On April 1, 2003, and every two years thereafter, every Level 2 carrier may file with the Commission for review and approval a Wholesale Service Quality Plan as specified in, and pursuant to, Subparts b, c, and d of this Part. For any filing due after April 1, 2003, if a Level 2 carrier proposes to maintain, without any additions, deletions or modifications, its existing Wholesale Service Quality Plan, the Level 2 carrier may file, in lieu of filing a new Wholesale Service Quality Plan, a verified statement indicating that it proposes to maintain in effect, without any additions, deletions or modifications, its existing Wholesale Service Quality Plan.*
- b) *For each investigation or review of a Wholesale Service Quality Plan filed with the Commission for review, unless otherwise ordered by the Administrative Law Judge or the Commission, the Commission shall initiate a proceeding and schedule a prehearing conference (see 83 Ill. Adm. Code 200.300) to occur no more than 21 days after the filing date. The purpose of the proceeding shall be to determine the adequacy and appropriateness of each Plan with respect to the requirements of the Act and this Part, and to adopt a Wholesale Service Quality Plan for the filing carrier. The carrier filing the Plan shall be a party to the proceeding. Other parties may intervene, pursuant to the Commission's Rules of Practice. The proceeding will be scheduled, unless otherwise ordered by the Administrative Law Judge or the Commission, so that a Proposed Order is presented to the Commission by the Administrative Law Judge no later than 3 months after the date of the carrier's filing as specified in Section 731.200. The Commission will adopt a carrier's Plan if it complies with the requirements of this rule. If no party objects to the Level 2 carrier's filed Wholesale Service Quality Plan and all active parties agree to proceed without a hearing, the Commission may adopt that Plan without hearing if it satisfies the requirements of this rule.*

- c) *Each carrier filing a Wholesale Service Quality Plan shall file prepared direct testimony and exhibits in support of the carrier's Plan. Prepared direct testimony shall be in compliance with the Commission's Rules of Practice (83 Ill. Adm. Code 200). At a minimum, the prepared direct testimony and exhibits shall address and/or include the following:*
- 1) *The carrier's wholesale service quality record over the last twelve months, including a summary of performance and of any remedy payments or credits paid, given and/or assessed over that time period.*
 - 2) *All changes to the carrier's Wholesale Service Quality Plan most recently adopted by the Commission or, if such carrier does not have a previously adopted Wholesale Services Quality Plan the basis for all Wholesale Service Quality measures and standards proposed by the carrier.*
 - 3) *Proprietary and Confidential Information. Any data, information or studies which are confidential, proprietary or trade secret in nature shall be so marked by the carrier. The carrier shall separate from its filing that information which is so marked as confidential, proprietary or trade secret in nature from the material which is to be made public.*
- d) *Each Wholesale Service Quality Plan shall include, at a minimum, the following components:*
- 1) *A set of wholesale measures and standards covering all necessary parts of a carrier's interaction with their wholesale customers. These measures and standards should include, but not be limited to, the following activities; FOCs, provisioning, and maintenance and repair. The services to be covered for a Level 2 carrier shall include, but not be limited to, Unbundled Local Loops, Interconnection Trunks, Resold Local Services, Collocation, Loss Notification, Customer Service Record and those Wholesale Services covered in such carrier's most recently adopted Wholesale Service Quality Plan.*
 - 2) *Established benchmarks and standards on a per measure basis to provide a clear indication of the minimum performance level the carrier intends to provide.*

- 391 3) *Fully defined business rules on a per measure basis that*
392 *are sufficient to describe what is being reported by the*
393 *measure. Business rules shall include an applicable title,*
394 *detailed definition, any exclusions, applicable standards or*
395 *benchmarks, levels of disaggregation, and the specific*
396 *calculation methodology used by the carrier.*
397
398 4) *Self-executing remedy provisions deemed sufficient to*
399 *modify a Level 2 carrier's actions in the event of*
400 *noncompliance with the standards contained therein.*
401
402 5) *Reporting policies and procedures so that all parties*
403 *understand exactly when and how the Level 2 carrier will*
404 *report data. These policies and procedures should also*
405 *cover data and remedy restatements in addition to the*
406 *regular monthly reporting of carrier performance. Each*
407 *carrier's Wholesale Service Quality Plan shall provide that*
408 *the Level 2 carrier will report monthly data to carriers*
409 *purchasing Wholesale Services.*
410
411 6) *A provision for periodic audits of the wholesale*
412 *performance data.*
413
414 e) *To the extent a Level 2 Carrier elects to file its own proposed*
415 *Wholesale Service Quality Plan, the Level 2 Carrier will not be*
416 *subject to the remaining provisions of Subpart F.*
417

418 **Q. Under CTC-Illinois' proposal, would Level 2 Carriers be required to**
419 **file a Wholesale Service Quality Plan?**

420 **A.** No. Level 2 Carriers would have the option to file a Wholesale Service
421 Quality Plan which would be subject to review and approval by the
422 Commission. Level 2 Carriers that elected not to file a Wholesale Service
423 Quality Plan would instead be subject to the alternative wholesale
424 requirements in Subpart F.
425

426 **Q. Why is it appropriate to allow each Level 2 Carrier to develop**
427 **company-specific wholesale service quality plans?**

428 A. In the context of wholesale service, the Commission has already
429 recognized that wholesale issues do not fit into a “one size fits all” bucket.
430 The two largest ILECs in the state, Ameritech and Verizon have each
431 developed company-specific wholesale service quality plans in the context
432 of two separate dockets: 98-0555 and 98-0866, respectively. These plans
433 were developed in the respective dockets based on the wholesale services
434 being provisioned by Ameritech and Verizon, and based upon issues and
435 concerns raised by CLECs actually purchasing wholesale services from
436 these two carriers. It would not be appropriate to subject Verizon to the
437 wholesale standards established for Ameritech in 98-0555 or as part of
438 Ameritech long distance 271 efforts. Similarly, it does not make sense
439 for two different Level 2 carriers, that use different systems, have different
440 wholesale activity and issues, to be subject to the same wholesale service
441 quality standards. Each carrier should be afforded the opportunity to
442 develop its own Wholesale Service Quality Plan based on the nature of its
443 business and the wholesale services and issues applicable to that company.

444
445 **Q. Under CTC-Illinois’s proposal would the ICC staff and or parties**
446 **purchasing wholesale services from Level 2 carriers be given the**
447 **opportunity to review and provide feedback on the Level 2 carrier’s**
448 **proposed wholesale service quality plan?**

449 A. Yes. Interested parties would be given a full opportunity to intervene and
450 participate in a proceeding to review and approve the Level 2 carrier's
451 wholesale service quality plan.

452
453 **Q. Should the wholesale service quality plan be subject to periodic review**
454 **and how often should a new plan be required?**

455 A. CTC-Illinois proposes that the LEC's wholesale service plan should
456 remain in effect for a minimum of two years without further Commission
457 review in the absence of a significant complaint proceeding by a
458 wholesale customer establishing a deficiency in the LEC's wholesale
459 service plan. Any shorter period would be unduly burdensome in that the
460 Level 2 carrier would have to modify its tracking and reporting
461 mechanisms to account for the new standards or requirements.

462
463 **III OTHER CONCERNS WITH PROPOSED PART 731 RULES**

464
465 **Q. Do you have other concerns with Staff's proposed rules?**

466
467 A. Yes, CTC-Illinois is very concerned about satisfying wholesale
468 performance standards proposed by Staff. In his accompanying testimony
469 Ken Mason addresses most of CTC-Illinois' issues and concerns and
470 recommended changes to the Part 731 wholesale service quality rule for
471 Level 2 carriers. I do, however, want to specifically address one issue in
472 Staff's proposed rule related to provisioning of Unbundled Local Loops.
473 Staff's proposed rule contains FOC, provisioning and repair standards for

“Unbundled Local Loops” without differentiating between analog, digital capable and other loop types. CTC-Illinois believes that it is critical that the Level 2 wholesale performance standards only apply to “analog” local loops provisioned to provide basic local exchange services.

Q. Describe the difference between an “analog” loop and a “digital” loop.

A. An analog local loop is a voice grade facility that supports 300 to 3000 Hz analog services. No line conditioning or treatment is required for the analog loop. In contrast to an “analog” loop, digital capable loop contains no bridged tap, no loading, no repeaters, 15,000 ft. maximum loop length, and 24 gauge (possible 22/24/26 gauge) wire combination. Within CTC-Illinois, each request for a digital capable loop must go through a pre-qualification process to determine whether the loop requested by the CLEC utilizes pair gain equipment or contains bridge tap or load coils

Q. Describe why loop pre-qualification and longer provisioning times may be required for digital loops associated with pair gain equipment?

A. In a number of instances where a digital capable loop may be ordered, CTC-Illinois utilizes pair gain equipment to augment existing cable plant. This situation is especially prevalent where a medium sized business has multiple lines at one location. In these situations, basic local exchange service is provided to the customer using pair gain equipment, but the pair

gain equipment is not capable of providing xDSL services. In order to meet the carrier's request for a digital capable loop, facility technicians must manually analyze the cable facilities in the area to complete customer rearrangements to free up cable facilities for the digital capable loop request. Once the facility technician completes the analysis and develops cut over and splicing sequences for other end-user customer lines, the technicians in the field must remove the existing end-user customer(s) from the pair gain equipment and move other customers to the equipment to free up the cable facilities required.

Q. Describe why loop pre-qualification and longer provisioning times may be required for digital loops containing bridge taps or load coils?

A. In those situations where a digital capable loop contains bridge tap or load coils, conditioning a loop must take place. To complete conditioning, a technician must go to each load coil location in the field, open the splice case associated with that load coil, disconnect the load coil pairs from the pair to be conditioned and splice the ends of each conductor and the pair back together. The technician then must close the splice case. Given the complexity of provisioning digital capable loops, the provisioning standards for Unbundled Local Loops in this proceeding should be limited to analog loops used to provide basic local exchange service. Staff has proposed an 8-day standard for conditioning loops when a digitally capable loop contains bridged taps or load coils and additional work activities

520 associated with conditioning the loop must be performed. The proposed 8-
521 day standard for conditioning loops only provides Level 2 Carriers with 3
522 additional days beyond the five day standard Unbundled Local Loop
523 provisioning interval to complete the engineering and field work associated
524 with conditioning the digital loop. Given the required resources and
525 complexity of the conditioning process, this is unreasonable and
526 unachievable in the rural communities served by CTC-Illinois. CTC-
527 Illinois has also proposed deleting the conditioning standard from Rule
528 731.605(b) (**Attachment 1.1 Lines1075-1083**). If Staff believes that
529 standards for provisioning digital capable loops should be included,
530 specific conditioning processes, and longer provisioning intervals to
531 accommodate the time frames to complete conditioning must be identified
532 for removing bridge taps, load coils, etc. from loaded loops.

533
534 **Q. Will eliminating digital loops and line sharing/splitting from the scope**
535 **of Part 731 for Level 2 Carriers result in substandard wholesale**
536 **service performance?**

537 A. No, I do not believe it will. CTC-Illinois has been operating in Illinois
538 since November 2000 and in the last 18 months, CTC-Illinois has not had
539 any requests for digital loops or line sharing/splitting in its central offices.
540 Consequently, to my knowledge, there have not been any problems, delays
541 or other issues associated with digital capable loops or line sharing/splitting
542 (including de-conditioning loops) associated with wholesale service

543 provisioning or repair. The suggestion that some problems may develop in
544 the future for Level 2 Carriers is purely speculative and places the
545 Commission in the position of arbitrarily establishing standards as a
546 solution before a problem has even been identified. Consequently, CTC-
547 Illinois has proposed limiting the wholesale service measures and remedies
548 to Unbundled Local Loops, which is limited to analog loops used to
549 provide “basic local exchange service.”

550
551 **Q. How should the Commission address the potential need in the future**
552 **for wholesale service quality standards for loops used to provide**
553 **advanced services?**

554 A. To ensure wholesale standards can quickly be put in place for digital
555 capable loops and/or line sharing/splitting, CTC-Illinois proposes adding
556 language to the Part 731 Rule that would allow a Requesting Carrier to
557 petition the Commission to expand the wholesale services measures
558 applicable to a specific Provisioning Carrier. CTC-Illinois’ proposal is
559 described in Ken Mason’s testimony and is included in **Attachment 1.1 at**
560 **lines 977-998**. With this provision, a Requesting Carrier that has
561 experienced a bona fide service problem with the provisioning or repair of
562 digital capable loops could petition the Commission to have wholesale
563 measures or standards imposed on a Provisioning Carrier that has
564 performed inadequately.

566 **Q. Does this conclude your testimony?**

567 **A. Yes.**